

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK

LEONY DAVID MAZUETA MUNOZ, CINDY E.  
BRITO REYES, and ELVIN ALCANTARA  
RODRIGUEZ,

Plaintiffs,

-against-

640, LLC and JASON FEINMAN,

Defendants.

Docket No.:

**NOTICE OF REMOVAL**

**TO THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK:**

Defendants, 640, LLC and Jason Feinman (hereafter “Defendants”), hereby apply for the removal of this action from the Supreme Court of the State of New York, County of Queens, to the United States District Court for the Eastern District of New York, and respectfully shows this Honorable Court:

**FIRST:** 640, LLC and Jason Feinman are the Defendants in a civil action brought against it in the Supreme Court of the State of New York, County of Queens; entitled:

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

LEONY DAVID MAZUETA MUNOZ,  
CINDY E. BRITO REYES, and  
ELVIN ALCANTARA RODRIGUEZ,

Plaintiffs,

-against-

640, LLC and JASON FEINMAN,

Defendants.

Index No.: 714904/2019

**SECOND:** A copy of the Summons and Complaint in this action is annexed hereto as Exhibit “A”. Defendants have not yet filed an Answer.

**THIRD:** 640, LLC is a limited liability company formed in New Jersey in June 2017 with its principal place of business located at 1026 Closter Dock Road, Alpine, New Jersey 07620. It is a single member limited liability company with its sole member being Josh Schneeweiss who resides at the same address.

**FOURTH:** Jason Feinman resides at 218 Kociemba Drive, River Vale, New Jersey 07675.

**FIFTH:** This matter involves a motor vehicle accident that occurred within the westbound lanes of the Grand Central Parkway in Queens County. Jason Feinman was driving a vehicle in the course of his employment with 640, LLC when the accident occurred. There are three Plaintiffs who are alleging serious injuries as a result and, during pre-litigation negotiations with Defendants’ insurer, Plaintiff’s counsel has alleged all three Plaintiffs have undergone surgery as a result of the accident. Specifically, Mr. Munoz underwent left shoulder arthroscopic surgery, Ms. Reyes underwent a percutaneous cervical discectomy and decompression at C4-5 and C5-6, and Mr. Rodriguez underwent a percutaneous lumbar discectomy and decompression. It is submitted that these alleged damages will undoubtedly exceed the jurisdictional limit of \$75,000.

**SIXTH:** Defendant, 640, LLC has not yet been formally served with the Complaint. Defendant, Jason Feinman, was served with the Complaint on September 30, 2019. Both Defendants consent to removal to this Court.

**SEVENTH:** This action is one over which this Court has original jurisdiction under the provisions of Title 28, United States Code, Section 1332, and is one which may be removed to this Court by Defendants pursuant to the provisions of Title 28 United States Code, Section 1441, in

that, it is a civil action brought in a Supreme Court against a foreign corporation whose principal place of business is outside of the State of New York, by a citizen of the State of New York, with the amount in controversy exceeding the sum or value of \$75,000.00, exclusive of interest and costs.

**WHEREFORE**, the Defendants pray that the above action now pending against it in the Supreme Court of the State of New York, County of Queens, be removed from there to this Court.

Dated: Brooklyn, New York  
October 11, 2019

**ROSSMAN LAW FIRM, LLC**

*/s/ Todd A. Rossman*

By: \_\_\_\_\_

**TODD A. ROSSMAN, ESQ.**

*Attorneys for the Defendants,*

**640, LLC and JASON FEINMAN**

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